



PC Jon Hancock,
Police Licensing Officer,
Swansea Central Police Station.

Jonathan.Hancock@south-wales.pnn.police.uk

Mrs Lynda Anthony.
The Divisional Licensing Officer,
City and County of Swansea,
Civic Centre,
Swansea.

18th October 2018

**Police Observations to application for a
Unlicensed Family Entertainment Centre Gaming
Machine Permit under the Gambling Act 2005.**

I am in receipt of the above application made under the requirements of the
Gambling Act 2005 for the below mentioned premises

Premises: Laser Amusements
 48 The Kingsway
 Swansea
 SA1 5HG

The application has been made by Christopher McGhan, [REDACTED]

Having considered the application on behalf of South Wales Police, I
can confirm that the Chief Constable wishes to make significant
representations as to why the application should not be granted in its
proposed form. The representations, supported by evidence are made
on the grounds that the granting of the licence in its current form will
undermine the promotion of the key licensing objective namely
Protecting children and other vulnerable persons from being harmed or
exploited by gambling.

This property is situated in the old Ty Hafan building on the Kingsway,
Swansea. The building would be divided over two floors, with a family
entertainment centre on the ground floor and a laser escape room in the

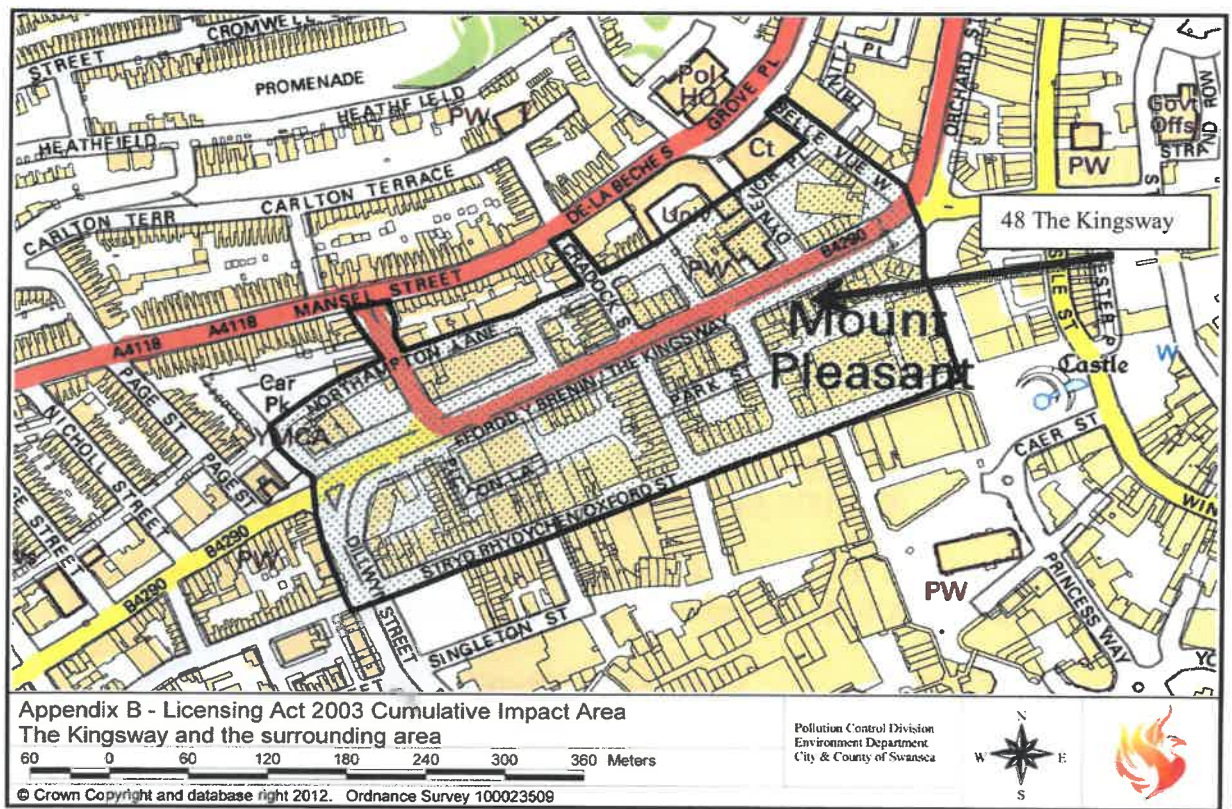
Mae Heddlu De Cymru yn croesawu derbyn gohebiaeth yn Gymraeg a Saesneg.
Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd
gohebu yn Gymraeg yn arwain at oedi.

South Wales Police welcomes receiving correspondence in Welsh and English.
Any correspondence received in Welsh will be answered in Welsh and corresponding
in Welsh will not lead to a delay in responding.

PROTECT - COMMERCIAL



basement area.



The applicant has provided the following operating hours within the application.

Monday – Friday – 1200-2000hrs
Saturday – Sunday – 1000-2200hrs

There would be no admittance to under 16's during school hours

South Wales Police, as a Responsible Authority hereby submits representations that to grant this application would have a negative impact on the licensing objective of protecting children and vulnerable persons from being harmed or exploited by gambling. This is based on the Info Nation premises which is located next door to the application. Info Nation is a one-stop shop for young people offering information, advice and specialist support to young people aged 11-25 and their families. It is a partnership between

Mae Heddlu De Cymru yn croesawu derbyn gohebiaeth yn Gymraeg a Saesneg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

South Wales Police welcomes receiving correspondence in Welsh and English. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

PROTECT - COMMERCIAL

Prif Gwnstabl **Matt Jukes QPM, MA(Oxon)MSc.** Chief Constable



Evolve (The City and County of Swansea's Young People Services), Barnardos Cymru and Drugaid Cymru, and is open Monday to Friday between 1230hrs and 1630hrs.

Protecting vulnerable people within our communities is an operational priority for South Wales Police and therefore South Wales Police submit that to operate an unlicensed family entertainment centre next door to a premises which offers support to young vulnerable people undermines the licensing objective and risks exploiting young vulnerable people through gambling.

South Wales Police feel that their approach is a fair and proportionate response.

Respectfully submitted for your information and consideration,

Yours sincerely,

Police Licensing Officer
(On behalf of the Chief Officer of Police)

John, Becca

From: Rees, Damian
Sent: 18 October 2018 12:49
To: John, Becca
Subject: Kingsway License.
Attachments: Document2.docx

Importance: High

Hi Becca here is the objection from me in respect of this application.

Damian Rees

Principal Officer for Safeguarding and Performance Quality

Child & Family Services / Gwasanaethau Plant a Theuluoedd

Swansea / Abertawe

Tel: 01792 635180

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.



Cyngor Abertawe
Swansea Council

Application for an Unlicensed Family Entertainment Centre (UFEC) - 48 The Kingsway, Swansea

Having considered that the application that we want to make significant representation to object the granting of the license application on the following grounds: **Protecting children and other vulnerable persons from being harmed or exploited by gambling.** (*Section 1, Objective c, Gambling Act (2005)*). This significant objection is supported by evidence made on the grounds that the granting of the licence will undermine the promotion of the key licencing objective, namely protecting children and other vulnerable person from being harmed or exploited by gambling.

The premises in question is located next door to Info-Nation, a long-established young person's centre. Info-Nation is a centre that provides a range of vital services to some of the most vulnerable young people in Swansea.

Although some young people access the centre as a part of series of positive choices about their life, many come into the centre because the issues they are dealing with make them more vulnerable and in need of support that they cannot access elsewhere.

Amongst the centre's client group are young people that use the following services:

- **Looked After Children / Leaving Care:** Amongst the client group that regularly use the centre are those young people who have been in care and to whom Swansea Council has a statutory duty, as their corporate parent, for their care and support. This includes the provision of weekly maintenance payments.
- **Substance Misuse:** The centre hosts Choices, the single point of referral for young people experiencing problems with substance misuse, in Swansea. This service is used by many young people who already have a harmful, addictive behaviour, as well as the need to ensure an income that supports it.
- **Youth Homelessness:** If a young person becomes homeless, they will have to visit Info-Nation to have their need assessed, and obtain their support.
- **Support for young people not in education, employment or training (NEET):** Info-Nation has a dedicated team supporting those young people who require additional support in order to be able to access opportunities for education, employment and training.

A common denominator for a vast proportion of these young people is that they have very little in the way of financial resources, but have a lot of time on their hands. This is often exacerbated by needing to wait to see a worker or obtain assistance when in crisis. This would make them particularly vulnerable to the lure of quick financial reward through the games that are often promoted within a Family Entertainment Centre. There is also a risk that a Family Entertainment Centre will act as a draw for people who might seek to exploit the more vulnerable clientele of such an establishment.

By locating the centre next door to a service that specifically works with vulnerable young people, this extends these risks beyond its own doors, and it is difficult to see how they could be sufficiently managed or mitigated, in relation to Info-Nation's client group.

In addition to the above The Youth Offending Service, working with vulnerable young people is also in very close proximity to this location and the concerns set out above would apply

I therefore request that you reject the aforementioned licensing application.

Damian Rees

Principal Officer for Safeguarding and Quality Assurance

Designated Lead for Child Protection/Local Authority Designated Officer (LADO)

John, Becca

From: Edwards, Andy
Sent: 18 October 2018 14:09
To: John, Becca
Cc: Evans, Gavin; Moxey, Rachel
Subject: RE: Application for an Unlicensed Family Entertainment Centre (UFEC) - 48 The Kingsway, Swansea

Dear Becca,

I am writing to you in my role as the manager responsible for Info-Nation, Swansea's one-stop shop for young people, which is adjacent to the above premises; I would like to object to the licensing application on the following grounds: **Protecting children and other vulnerable persons from being harmed or exploited by gambling.** (*Section 1, Objective c, Gambling Act (2005)*)

The premises in question is located next door to Info-Nation, a long-established young person's centre that provides a range of vital services to some of the most vulnerable young people in Swansea. Although some young people access the centre as a part of series of positive choices about their life, many come into the centre because the issues they are dealing with make them more vulnerable and in need of support that they cannot access elsewhere.

Amongst the centre's client group are young people that use the following services:

- **Looked After Children / Leaving Care:** Amongst the client group that regularly use the centre are those young people who have been in care and to whom Swansea Council has a statutory duty, as their corporate parent, for their care and support. This includes the provision of weekly maintenance payments.
- **Substance Misuse:** The centre hosts Choices, the single point of referral for young people experiencing problems with substance misuse, in Swansea. This service is used by many young people who already have a harmful, addictive behaviour, as well as the need to ensure an income that supports it.
- **Youth Homelessness:** If a young person becomes homeless, they will have to visit Info-Nation to have their need assessed, and obtain their support.
- **Support for young people not in education, employment or training (NEET):** Info-Nation has a dedicated team supporting those young people who require additional support in order to be able to access opportunities for education, employment and training.

A common denominator for a vast proportion of these young people is that they have very little in the way of financial resources, but have a lot of time on their hands. This is often exacerbated by needing to wait to see a worker or obtain assistance when in crisis. This would make them particularly vulnerable to the lure of quick financial reward through the games that are often promoted within a Family Entertainment Centre. There is also a risk that a Family Entertainment Centre will act as a draw for people who might seek to exploit the more vulnerable clientele of such an establishment.

By locating the centre next door to a service that specifically works with vulnerable young people, this extends these risks beyond its own doors, and it is difficult to see how they could be sufficiently managed or mitigated, in relation to Info-Nation's client group.

An additional consideration, to take into account, is the close proximity of both the youth courts and Western Bay Youth & Early Intervention offices. This increases the volume of young people that would be considered vulnerable in relation to the proposed facility.

I would therefore request that you reject the afore mentioned licensing application.

Yours sincerely,

Andy

Andy Edwards

Targeted and Specialist Services Manager - **Rheolwr Gwasanaethau a Dargedir ac Arbenigol**


Swansea Young People Services - **Gwasanaethau Pobl Ifanc Abertawe**

Swansea Council - **Cyngor Abertawe**

Info-Nation, 47 The Kingsway, Swansea, SA1 5HG

Info-Nation, 47 Ffordd y Brenin, Abertawe, SA1 5HG

 07557 481489

 andy.edwards@swansea.gov.uk

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.



View my profile on [LinkedIn](#)